



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*86 Chambers Street  
New York, New York 10007*

June 18, 2024

**By ECF**

The Honorable Paul A. Engelmayer  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *Reclaim the Records v. United States Citizenship and Immigration Services*,  
23 Civ. 1997 (PAE)

Dear Judge Engelmayer:

This Office represents United States Citizenship and Immigration Services (the “Government”), defendant in this action brought pursuant to the Freedom of Information Act, 5 U.S.C. § 552 (“FOIA”). We write to inform the Court that, despite the parties’ best efforts, they have been unable to resolve plaintiffs’ “policy and practice” claim. The Government therefore intends to file a motion to dismiss that claim. With plaintiffs’ consent, we write respectfully to propose the following briefing schedule, which accommodates counsel’s vacation schedules and would provide the parties sufficient time to brief the issues:

- Opening papers due 8/16/2024
- Opposition papers due 9/13/2024
- Reply papers due 10/4/2024

We thank the Court for its consideration of this request.

Respectfully,

DAMIAN WILLIAMS  
United States Attorney  
Southern District of New York

By: /s/ Ilan Stein  
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